

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

<b>ADMIIIN INC. d/b/a PARO INC., A Delaware Corporation,</b>	)	
	)	
	)	
<b>Plaintiff,</b>	)	<b>Case No. 1:23-cv-04430</b>
	)	
<b>v.</b>	)	<b>Judge Franklin U. Valderrama</b>
	)	
<b>LUKE KOHAN an individual, and FIRMKEY SOLUTIONS LLC,</b>	)	<b>Magistrate Judge M. David Weisman</b>
	)	
	)	
<b>Defendants.</b>	)	

**JOINT STATUS REPORT**

Pursuant to the Court’s Memorandum Opinion and Order dated July 19, 2023 [dkt. 17], the parties submit this Joint Status Report addressing: (a) a proposed expedited discovery schedule, including the anticipated number of depositions per side, and proposed number of interrogatories, number of requests to admit, and requests for production; (b) a proposed date for an in-person preliminary injunction hearing; (c) the anticipated length of a preliminary injunction hearing; and (d) the number of witnesses per side.<sup>1</sup>

**A. Proposed Expedited Discovery Schedule**

The parties propose that they be required to propound written discovery requests no later than August 1, 2023. Due to Kohan’s impending wedding and honeymoon, the parties propose that they be required to serve their objections and responses to written discovery no later than August 24, 2023. Depositions would commence thereafter, and expedited discovery would close

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<sup>1</sup> Although the Court’s July 19 Order did not ask the parties to submit a proposed due date for Defendants’ Answer or other responsive pleading, the parties have agreed that Defendants’ responsive pleading should be due August 11, 2023, and respectfully ask the Court to include the August 11 due date in its Scheduling Order.

on September 22, 2023. Written discovery would be limited to twenty-five (25) requests for production, fifteen (15) interrogatories, and ten (10) requests to admit *per party*. The parties would be limited to three (3) depositions.<sup>2</sup>

**B. The In-Person Preliminary Injunction Hearing**

The parties propose that the in-person preliminary injunction hearing commence on October 10, 2023, and be scheduled for two (2) days (October 10 and 11). Each side would be limited to three (3) witnesses in their respective cases in chief, in addition to any rebuttal witnesses.

Dated: July 24, 2023

Respectfully submitted,

**ADMIN INC. d/b/a PARO INC.**

**LUKE KOHAN AND FIRMKEY  
SOLUTIONS LLC**

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<sup>2</sup> For example, Plaintiff would be permitted to serve 25 requests for production on Kohan and an additional 25 requests for production on FirmKey, and vice versa. The parties agree that Plaintiff would be limited to a *total* of three (3) depositions, and Defendants would be limited to a *total* of three (3) depositions between them.